

SAN MIGUEL COUNTY
 BOARD OF COMMISSIONERS
 ART GOODTIMES

S246

Feb. 4, 2000

Chief Michael Dombeck
 U.S. Forest Service
 c/o Survey and Manage SEIS
 Content Analysis Enterprise Team
 Attn: USDA Forest Service-CAET
 P.O. Box 221090
 Salt Lake City, UT 84122

CAET RECEIVED

FEB 17 2000

Chief Dombeck,

I am writing to comment on the Draft Supplemental Environmental Impact Statement for the Northwest Forest Plan's Survey and Manage Protocols. The alternatives analyzed are far too narrow. No alternative considers increased protection of ancient forests or the species that depend on them. For these reasons the Draft SEIS should be pulled until a "No logging old growth" Citizens Alternative is analyzed.

Logging ancient forests:

- ... destroys valuable wildlife habitat
- ... contributes to the decline of salmon populations
- ... pollutes public drinking water supplies
- ... devastates rural community economies
- ... increases the size and frequency of landslides and floods
- ... degrades the scenic beauty of the Northwest
- ... limits recreational opportunities
- ... costs taxpayers millions of dollars every year
- ... suppresses the development of more sustainable fiber alternatives

Which is exactly why the last remaining ancient forests on public lands should be immediately and permanently protected. If large corporations like Kinko's and Home Depot can phase out their dependence on old growth, why can't our federal government?

I strongly oppose the logging of old growth and am extremely disappointed that the Draft SEIS actually calls for an increase in the logging of old growth. We should set an example for the world by stopping the liquidation of the remaining ancient forests in the United States.

P.O. Box 1170 • Telluride, Colorado 81435 • (970) 728-3844 • FAX (970) 728-3718

S 246

Wasn't it you, sir, that said:

"What distinguishes a truly wealthy nation from one that merely generates wealth is the foresight and wisdom to leave behind a richer legacy than we inherited, to make short-term sacrifices to advance long-term gains, to proceed humbly and cautiously in managing our natural resource endowment."

I hope we can live up to that noble ideal in our management of the public lands.

Sincerely,



Art Goodtimes
president, Telluride Institute
vice-president, Western District, Colorado Counties, Inc.
member, Public Lands Steering Committee, CCI
member, Public Lands Steering Committee, National Association of Counties
boardmember, Club 20
boardmember, BLM Southwest Resource Advisory Council
boardmember, Painted Sky Resource Conservation and Development Council
senator-at-large, Western Colorado Congress



February 15, 2000

COUNTY OF SISKIYOU

Board of Supervisors

P.O. Box 338 • 311 Fourth Street
Yreka, California 96097

S.307

(530) 842-8081
FAX (530) 842-8093

Survey and Manage SEIS
Content Analysis Enterprise Team
Attn: USDA Forest Service - CAET
P.O. Box 221090
Salt Lake City, UT 84122

Dear Sir:

Subject: Comment on the Draft Supplemental Environmental Impact Statement (DSEIS)
Amending Survey and Manage Requirements

Thank you for the opportunity to comment on proposed changes to Survey and Management Requirements. We have the following comments on the proposed rule:

1. There needs to be another purpose for the DSEIS, and that is to identify the best approach to ecosystem management for all species and habitats. The Board would like this DSEIS process to include a review, with analysis and discussion, of "Alternative Approaches to Assessments of Species and Ecosystems", pp. II-99 to II-103, in the FEMAT Report. This section discussed the problems associated with managing forests on a species-by-species approach versus a landscape approach. We feel it is now time to address this issue again.
2. Alternative 1 is listed as the Preferred Alternative in part because it provides "a balance between species protection and a predictable and sustainable level of timber and other outputs." It is hard to accept this reasoning since a balance has not been provided by the Northwest Forest Plan (NWFP) yet.
3. Agencies have not been diligent in implementing the NWFP at all levels, pp. 4, DSEIS. The Administration has been absent in providing leadership in implementing their own plan. The "unprecedented level of interagency cooperation" has not been enough because cooperation before the NWFP was relatively non-existent and because budget and resources have not allowed for the degree of cooperation necessary to effectively implement the NWFP.
4. PP. 4, DSEIS, says that 1.6 bbf of timber were offered for sale over the two year period of FY 97 & 98. The annual sale level was projected at 1.1 bbf. The DSEIS is disingenuous.
5. PP. 6, DSEIS: We don't believe that objectives for managing Survey and Manage Species were or are being met. The Survey and Manage Standard and Guideline (S&G) was not imposed immediately as the NWFP was incorporated into the Land Management Plans of the National Forests involved. Time was allowed to prepare the survey protocols and management protocols necessary for proper, professional implementation of the S&G. Even though these protocols were not ready for all the species involved and budget and resources were not adequate to effectively implement the NWFP, the Administration allowed the S&G to come into effect anyway.

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JOAN T. SMITH
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LA VADA ERICKSON
District 2

BILL HOY
District 3

JERRY GIARDINO
District 4

KAY M. BRYAN
District 5

FEB 18 2000

CAET-USDA Attention: Planning Rule
Page 2 of 2
February 15, 2000

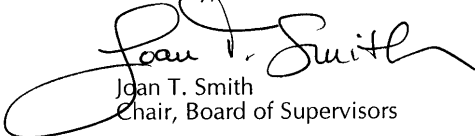
3307

6. The DSEIS attempts to provide a rationale for management for viable populations by using a persistence approach. Management for populations will require similar efforts that were made for the Northern Spotted Owl. The resources needed to obtain the necessary information are not available and will likely never be. The FEMAT or appropriate group of scientists needs to be convened to resolve this issue. There needs to be enough time to implement necessary ecosystem management activities on the ground to substantially reduce the risk of catastrophic loss of valuable resources in the forests to a more natural level.
7. Protocols for the management of species are not included. Additional train-wrecks will occur from not having these protocols in place.
8. There is a question regarding the commitment of the Administration to provide the necessary leadership at this point in time to put Survey and Manage and the NWFP back on track such that it will survive into the next Administration.
9. There is not a reasonable range of alternatives. Without Management Protocols the region is headed for more delays and problems. An alternative that would delay the use of the Survey and Manage S&G until adequate information is available should be included.

It is past time to assure effective implementation of the President's Plan; the balance promised in the plan has not been attained. While the Plan is a "100 year Plan", time is of the essence for the health of our forest ecosystems and our people. The risk to the overall health of the Forest from catastrophic loss is increasing substantially while resource outputs, especially those affecting the health of the economies of our forest resource dependent communities, have been substantially reduced. There have been substantial social costs; school enrollment has declined markedly as people move away to other jobs. Obviously, the President's plan has not and is not being implemented effectively. Our Klamath PAC representative has reported a similar conclusion.

Thank you for the opportunity to comment on your proposed rule.

Sincerely,



Joan T. Smith
Chair, Board of Supervisors

JWD/lrf

cc. Senator Dianne Feinstein
Senator Barbara Boxer
Congressman Wally Herger

JOAN T. SMITH
District 1

LA VADA ERICKSON
District 2

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District 3

JERRY GIARDINO
District 4

KAY M. BRYAN
District 5

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Subject: Old Growth Logging
 Sender: anderson16a / INTERNET (anderson_16a@leg.wa.gov)
 Attached Date: 02/22/00 10:35
 Priority: normal
 Sensitivity: normal
 Importance: normal

93.

Part 1

FROM: anderson,da / INTERNET
 CDT1=RFC-H22; DSV1=anderson_da@leg.wa.gov

TO: survey / wo. east-alc

Part 2

APPLE MESSAGE HEADER

Part 3

To Whom It May Concern:

I am writing to voice my concerns against an old-growth logging amendment. The Forest Service and BLZ have proposed to the Northwest Forest Plan. I understand this amendment would:

short cut the requirements to survey for rare species which are associated with old growth forests;

increase the allowable cut by 15 and 110 board feet per year;

open up an additional 20,000 acres of mature and ancient forest for logging and

ignore the need to thin young plantations and restore watersheds.

For all these reasons and more, I ask that you withdraw the "Survey and Manage Environmental Impact Statement" and issue a new EIS that finally stops logging old growth forests.

Reminder: Less than 10 percent of the timber in Oregon and Washington comes from federal land, and only about 2 percent of the total jobs in the region are in lumber and wood products.

Sincerely,

Representative Dave Anderson, Vice-Chair
 House of Representatives Natural Resources Committee
 Olympia, Washington 98504-6600

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FEB 23 2000

SURVEY AND
 MANAGE



THE CONFEDERATED TRIBES OF THE WARM SPRINGS RESERVATION OF OREGON

NATURAL RESOURCES DEPARTMENT
P.O. Box C, Warm Springs, Oregon 97761

March 3, 2000

Survey and Manage DSEIS
Content Analysis Enterprise Team
Attn.: USDA Forest Service - CAET
P.O. Box 221090
Salt Lake City, UT 84122

RE: Survey and Manage DSEIS

Dear Sirs:

The Confederated Tribes of the Warm Springs Reservation ("CTWSRO") met with Forest Service and BLM staff on February 29, 2000, to discuss the Survey and Manage DSEIS. We have not reviewed the document in detail, but would like you to consider the following comments in developing the FSEIS.

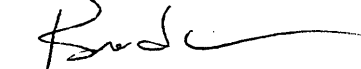
1. We are aware of a concern on the part of conservationists and several of Oregon's political representatives that the DSEIS does not present a full range of alternatives; specifically, that it does not consider an alternative that puts an end to harvest of old growth. It seems to us this alternative would be useful to consider given the impracticality of the "no action" alternative (i.e., survey according to the Northwest Forest Plan) and the stifling effect that pre-disturbance survey requirements have had and may continue to have on activities proposed for non-old growth sites. Would protecting remaining old growth be the most economical and effective way of carrying out the intent of the survey and manage requirements, which is to assure the persistence of old growth dependent species? It would certainly seem preferable to a system that attempts to protect old

growth-dependent species by requiring pre-disturbance surveys on non-old growth sites.

2. We have some concern that the plan will offer no protection to species not on the original list of 414 species. Does the preferred alternative contain a mechanism for adding species to the list?
3. We do support modifying the survey requirements to eliminate the need to survey for species that are clearly not old growth-dependent (provided sufficient habitat exists for those species).
4. The FSEIS should take into account the success or lack thereof of the Northwest Forest Plan in protecting the spotted owl. Again, we believe the intent of the preferred alternative should be to protect old growth-dependent species, not simply to make the survey requirement more manageable.

Thank you for taking these comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Nye', with a long horizontal flourish extending to the right.

Brad Nye

cc: Robert A. Brunoe, GM CTWSRO Natural Resources